

Federal Defenders
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Via Email and ECF

Hon. Richard M. Berman
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10001

Re: *United States v. Robert Hadden*, 20 Cr. 468 (RMB)

Dear Judge Berman,

The defense writes, with the consent of the government and U.S. Pretrial Services, to respectfully request that the Court modify the conditions of Mr. Hadden's release to permit him to take his son, who is severely autistic, on field trips twice a month at the discretion of Pretrial Services as to location and timing. Mr. Hadden has been in perfect compliance with the terms of his release over the last 13 months. While he is already permitted, under the explicit terms of the bond, to leave his home in order to take care of "necessities" for his children, wife and household, the requested modification would allow Pretrial the discretion to approve, where they deem appropriate, Mr. Hadden taking his son, for example, to museums or sporting events, so that his son may engage with the outside world.

Thank you for your consideration of this request.

Respectfully Submitted,

Deirdre D. von Dornum
Michael D. Weil
Counsel for Robert Hadden

cc: Counsel of Record (by ECF)
Robert Hadden
U.S. Pretrial Services